

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Joshua Otey, being duly sworn, declare and state as follows:

**Introduction and Agent Background**

1. I make this affidavit in support of a Criminal Complaint charging Jeffery Paul COOLIDGE AKA “phantasy,” on or about August 8, 2023, in the District of Vermont, with violations of Title 18, United States Code, Sections 2251(a) (production of child pornography) and 2252(a)(2) (distribution of child pornography), and, on or about August 9, 2023, with violations of Title 18, United States Code, Sections 2252(a)(4) (possession of child pornography) (the “Subject Offenses”).

2. I have served as a Homeland Security Investigations (HSI) Special Agent (SA) since March 2020. As such, I am an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), and I am empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516. I am presently assigned to the HSI office in Burlington, Vermont, whose geographic jurisdiction encompasses the District of Vermont. I have received extensive training provided by the Federal Law Enforcement Training Center and HSI in the investigation and enforcement of laws of the United States. I have participated in numerous criminal investigations regarding violations of federal narcotics, human trafficking, firearms, child exploitation, and financial laws.

3. The statements contained in this affidavit are based in part on information provided by other members of local, state, and federal law enforcement, as well as my own investigation, to include personal observations, documents, and other investigative materials which I have reviewed, as well as my training and experience as a Special Agent with HSI. Because this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not

included each and every fact known to me concerning this investigation. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

#### **Probable Cause**

4. On August 09, 2023, the Honorable Kevin J. Doyle, U.S. Magistrate Judge, issued a search warrant in the District of Vermont for the premises of 81 Berlin Street, Apartment 2, Montpelier, Vermont. A true and correct copy of the search warrant and the corresponding application and affidavit are attached hereto as **Exhibit 1** and are hereby incorporated into this affidavit.

5. On August 9, 2023, at approximately 18:20 hours, Chief Eric Nordenson of the Montpelier Police Department and I met with COOLIDGE in the driveway outside of his residence after making a pre-arranged call to COOLIDGE and allowing him to view the new Montpelier Police Department truck operated by Chief Nordenson. Upon making contact with COOLIDGE, Chief Nordenson allowed him to view the vehicle and engaged in casual conversation, which included COOLIDGE's posing for a photograph with the vehicle. During this interaction, I engaged COOLIDGE in conversation and advised that I was working on an internet related investigation and asked if he would mind speaking with me at the Montpelier Police Department. COOLIDGE agreed without hesitation. COOLIDGE entered the rear seat of the Montpelier police vehicle, and Chief Nordenson drove us back to Montpelier Police Department.

6. Upon arrival at Montpelier Police Department, Vermont Attorney General Detective Jesse Sawyer and I met with COOLIDGE in a recorded interview room within the police department. Detective Sawyer and I identified ourselves to COOLIDGE and advised him that he

was not under arrest and under no obligation to speak with us. COOLIDGE acknowledged what we said and chose to speak with us without hesitation.

7. During the interview COOLIDGE described his computer usage activities, including his use of the darkweb through a TOR browser. COOLIDGE advised in sum and substance that he is a “member” of a darkweb site he referred to as “Boys Club” and that he utilizes the username “phantasy.” COOLIDGE explained the functionality of the site to include achieving status as a “member” and stated that he had been affiliated with the site for approximately one year. COOLIDGE explained that membership is ultimately decided by moderators of the site and a new user starts as a “guest” and can earn the level of “registered guest” before ultimately earning the level of “member.” COOLIDGE described the site as being dedicated to those with a sexual interest in male children between the age of four and fourteen years old and that rules of the site dictated the age and gender of the subjects of content posted and shared. COOLIDGE admitted to having viewed files depicting “child pornography” on the site. COOLIDGE described having a fetish and sexual interest in thermometers inserted into the anuses of children and admitted to having sought material depicting said content. COOLIDGE admitted to recent contact with a six-year-old male child, hereinafter referred to as Minor Victim 1 (“MV1”), who COOLIDGE stated resides in the downstairs portion of his residence. COOLIDGE admitted that during that recent contact, he had inserted a thermometer into MVI’s anus and taken photographs. COOLIDGE further admitted to having shared those photographs with others through the internet. COOLIDGE said this activity had occurred on two occasions, the most recent occurring in the evening of Tuesday, August 8, 2023, inside COOLIDGE’s apartment. COOLIDGE said that he told MV1 not to tell anyone about what had happened.

8. COOLIDGE consented to a search of his iPhone 13, which was on his person. I reviewed the photos application of the device, and, within the deleted photographs, I observed several photographs depicting an apparent minor prepubescent child consistent with the appearance of MV1. Those photographs are described as follows.

a. IMG\_3571 is an image that depicts a nude male child's buttock, from the waist to the midcalf, being penetrated by what appears to be a glass thermometer. The child appears to be wearing blue bottoms and a blue shirt with a yellow design on it. There was a brown, white, and black patterned fabric visible under the child. Data of the image revealed the image was captured utilizing an iPhone 13 on August 8, 2023, at 14:28 hours.

b. IMG\_3572 is an image that depicts a nude male child's buttock as the child is facing away from the camera. The child is visible from the waist to the midcalf with a clear, zoomed-in focus on the anus as it is being penetrated by what appears to be a glass thermometer. There is an apparent Caucasian subject's hand spreading the child's buttocks and a clear viscous fluid visible around the child's anus. Data of the image revealed the image was captured utilizing an iPhone 13 on August 8, 2023, at 14:28 hours.

9. After I reviewed the photographs in the deleted portion of the photos application, particularly IMG\_3572, COOLIDGE stated that IMG\_3572 was taken during the time he was alone with MV1 as he had previously described on August 8, 2023. I asked COOLIDGE about the clear viscous fluid visible in the photograph, and COOLIDGE said it was Vaseline and that he had applied the substance to lubricate the thermometer and prevent harm to MV1.

10. HSI agents met with the parents of MV1, who confirmed that MV1 had spent time alone with COOLIDGE in COOLIDGE's apartment. MVI's parents described a time in or about March 2023 when COOLIDGE came to their residence and asserted that he needed to practice

taking rectal temperatures on a child for a test he was preparing for. MVI's parents stated that COOLIDGE utilized a rectal thermometer on MV1 in their presence in or about March 2023, within their residence, and that they were uncomfortable with it. MVI's parents provided a text message from COOLIDGE to MVI's father, dated March 27, 2023.

a. (COOLIDGE) "Good morning gopal. I hope you are having a great morning. I have been studyng hard this morning and will continue to do so. I have a question. I'm concerned I didn't' do a good job with [MV1]'s temperature yesterday. When [MV1] gets home from school and settled and I can talk to him if he is ok with me trying his temperature again so I can do a better job is that ok? I just want to do a good job at my entry test tomorrow night. I know it's a lot to ask but I feel it will help me. Is that ok? It will be the last time."

### Conclusion

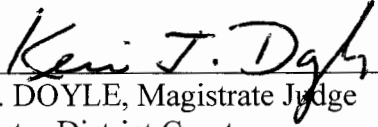
11. For the reasons outlined above, I submit there is probable cause to believe that on or about August 8, 2023, in the District of Vermont, Jeffery Paul COOLIDGE aka "phantasy" violated Title 18, United States Code, Sections 2251(a) (production of child pornography) and 2252(a)(2) (distribution of child pornography), and, on or about August 9, 2023, Title 18, United States Code, Sections 2252(a)(4) (possession of child pornography) (the "Subject Offenses"). I request that the Court issue a Criminal Complaint charging him accordingly.

Dated at Burlington, in the District of Vermont, this 11<sup>th</sup> day of August 2023.

Respectfully submitted,

*Attested to by reliable electronic means*  
Joshua Otey, Special Agent  
Homeland Security Investigations

Attested to by the complainant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
FaceTime (specify reliable electronic means) on this 11<sup>th</sup> day of  
August 2023.

  
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KEVIN J. DOYLE, Magistrate Judge  
United States District Court  
District of Vermont